

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

PETER GALINIS,

Plaintiff,

v.

Case No. 1:14-cv-00460

Hon. Paul L. Maloney, Chief Judge

THE COUNTY OF BRANCH, THE CITY OF
COLDWATER, THE BRANCH COUNTY
SHERIFF'S OFFICE, THE CITY OF
COLDWATER POLICE DEPARTMENT,
DEPARTMENT, BRANCH COUNTY SHERIFF
C. JOHN POLLACK, both individually and as a
member of the Branch County Sheriff's
Department, and CITY OF COLDWATER
POLICE OFFICERS BRIAN WOHLHETER,
DAVID PIPE and NICK THORTON, both
individually and as members of the
City of Coldwater Police Department

**Coldwater Defendants' Proposed
Questions on Voir Dire**

Defendants.

William F. Piper (P38636)
Attorney for Plaintiff
WILLIAM F PIPER LLC
1611 West Centre Ave., Suite 209
Portage, Michigan 49024
(269) 321-5008
E-mail: wpiper@wpiperlaw.com

S. Randall Field (P31841)
Andrew James Brege (P71474)
Attorneys for Defendants Branch County,
Branch County Sheriff's Office, and Pollack
JOHNSON, ROSATI, SCHULTZ & JOPPICH
822 Centennial Way, Suite 270
Lansing, Michigan 48917
(517) 886-3800
(517) 886-9154
E-mail: rfield@jrsjlaw.com
abrege@jrsjlaw.com

Michael S. Bogren (P34835)
Robert A. Callahan (P47600)
Attorneys for Defendants City of Coldwater,
City of Coldwater Police Department, and
Police Officers Wohlheter, Pipe and Thorton
PLUNKETT COONEY
950 Trade Centre Way, Suite 310
Kalamazoo, Michigan 49002
(269) 226-8851
E-mail: mbogren@plunkettcooney.com
rcallahan@plunkettcooney.com

COLDWATER DEFENDANTS' PROPOSED
QUESTIONS ON VOIR DIRE

Defendants, Brian Wohlheter, David Pipe and Nick Thorton, by and through their attorney, Robert A. Callahan, for their proposed questions on voir dire, provides as follows:

1. Has any member of the jury panel, or any members of his or her family, ever been a plaintiff in a lawsuit?

2. Has any member of the jury panel, or any members of his or her family, ever made a claim for monetary damages, irrespective of whether it resulted in a lawsuit being filed or not?

3. Has any member of the jury panel, or any members of his or her family, ever experience what they considered to be a negative experience with a police officer?

4. Has any member of the jury panel, or any members of his or her family, ever experience what they considered to be a positive experience with a police officer?

5. Does any member of the jury panel have any disagreement with rules precluding the possession of cellphones or other recording devices in courthouses?

6. Does any member of the jury have any disagreement with rules that preclude creating a disturbance in a courthouse?

7. Does any member of the jury panel not agree with the requirement that any damages which can be awarded to a plaintiff cannot be speculative, but that the plaintiff is required to prove those damages?

Dated February 6, 2017

Respectfully submitted,

PLUNKETT COONEY

By: /s/ Robert A. Callahan
Robert A. Callahan (P47600)
Attorney for Defendants Wohlheter,
Pipe and Thorton
950 Trade Centre Way, Suite 310
Kalamazoo, MI 49002
Direct Dial: 269/226-8856

Open.00560.41221.18036391-1